

STATEMENT OF BASIS (AI No. 33056)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0095184 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Savoie's Sausage & Food Products, Inc.
Savoie's Sausage Kitchen
1742 Highway 742
Opelousas, LA 70570

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: January 29, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: April 1, 2004
LPDES permit expiration date: March 31, 2009
EPA has not retained enforcement authority.

C. Date Application Received: November 10, 2008

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - food processing plant**

The existing food processing plant discharges treated process wastewater generated by the processing and packaging of approximately 18,500 lbs/day of sausage and meat products (tasso, hoghead cheese, and sliced pickled pork), 3,000 lbs/day of frozen dressing mix, and 3,600 lbs/day of jarred roux mix. Equipment for the processing of the sausage and meat products is rinsed daily, whereas the equipment used for processing of dressing mix and roux is rinsed every three weeks. The process wastewater is generated by the washing and disinfecting of the process area and equipment throughout the day. The wastestreams undergo treatment via two 15,000 gallon mechanical treatment systems before discharge. An 8,000 gallon holding tank has been installed to prevent overflow through the treatment system during surges. Sanitary wastewater is routed through the same mechanical treatment system. The facility began operations in 1955, occupies 3 acres, and processes year round.

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B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 2013

C. LOCATION - 1742 Highway 742 in Opelousas, St. Landry Parish
Latitude 30°32'14", Longitude 91°59'18"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated process wastewater, and treated sanitary wastewater
Treatment: Aeration and chlorination. Wastewater flows into an 8000 gallon holding tank (put in place to stop flow surges) before passing through two 15,000 GPD extended aeration mechanical treatment systems. Second system contains a chlorinator.

Location: at the point of discharge from the effluent pipe leading from the second mechanical treatment plant prior to combining with any other waters

Flow: 0.013 MGD

Discharge Route: unnamed ditch, thence into Bayou Little Teche

4. RECEIVING WATERS

STREAM - unnamed ditch, thence into Bayou Little Teche

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL WATERBODIES

Subsegment 060301, Bayou Teche - Headwaters at Bayou Courtableau to Keystone Locks and Dam, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 060301 was previously listed as impaired for suspended solids/turbidity/siltation, nutrients, organic enrichment/low DO, pathogen indicators, carbofuran, and phosphorus for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

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The following TMDL's have been established for subsegment 060301:

Bayou Teche Oxygen Demand/Nutrients (final February 25, 2000)
Addendum to the 2000 Bayou Teche TMDL for Biochemical Oxygen-Demanding Substances (November 30, 2005)

As per the Addendum to the TMDL, "Savoie's Sausage Kitchen is given limitations consistent with Meat Products Effluent Limitation Guidelines."

Bayou Teche Fecal Coliform (final April 5, 2001)

As per the Bayou Teche Fecal Coliform TMDL, "there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL." Therefore, Fecal Coliform effluent limitations shall be based on similar discharges.

TMDL for TSS, Turbidity, and Siltation for the Bayou Teche Watershed (final May 2, 2002)

As per the TMDL, "Point source loads do not represent a significant source of TSS as defined in this TMDL. Point sources discharge primarily organic TSS, which does not contribute to habitat impairment resulting from sedimentation. Because the point sources are minor contributors, and dischargers of organic suspended solids from point sources are already addressed by LDEQ through their permitting of point sources to maintain water quality standards for DO, the wasteload allocation for point source contributions were set to zero. This TMDL only addresses the landform contribution of TSS/sediment and does not address the insignificant point source contributions." Therefore, with respect to the TMDL, LDEQ has determined that TSS limits shall be based on effluent limitations guidelines.

TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion Teche River Basins (final March 21, 2002)

No allocation was given to point source discharges in the Vermilion Teche River Basin. According to the TMDL, there is only one point source in the Vermilion Teche (FMC Corp. LA0064360) but it does not discharge Carbofuran. In addition, this facility has no potential to discharge Carbofuran. Therefore, requirements for Carbofuran will not be placed in this permit.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: treated sanitary wastewater has been added to Outfall 001 description.

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7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - DMRs were reviewed from January 2007 to December 2008. There were no excursions.

8. EXISTING EFFLUENT LIMITS

Outfall 001 -

BOD	5.2:10.4 lbs/day
TSS	6.3:12.6 lbs/day
Oil and Grease	1.8:3.7 lbs/day
Ammonia	4.0:8.0 mg/l
Fecal Coliform	---:400 colonies/100 ml
pH	6-9 s.u.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 060301 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

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12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2013 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. For renewal permit issuance, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility. (see Narrative Requirements for the AI).

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Rationale for Savoie's Sausage & Food Products, Inc.

1. Outfall 001 treated process wastewater, and treated sanitary wastewater (estimated flow is 13,000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (lbs/day)	<u>Reference</u>
Flow	Report: Report	LAC 33:IX.2707.I.1.B
BOD ₅	5.2: 10.4	40 CFR 432.72
TSS	6.3: 12.6	40 CFR 432.72
Oil & Grease	1.8: 3.7	40 CFR 432.72
Ammonia (mg/L)	4.0: 8.0	40 CFR 432.73
Fecal Coliform colonies/100 ml	--- : 400	40 CFR 432.72
pH	6.0 su to 9.0 su	40 CFR 432.3

Treatment: Aeration and chlorination

Monitoring Frequency: 1/month for all limits.

Limits Justification: Since sausage and meat process wastewater makes up a majority of the discharge, limits are based on Effluent Limitations Guidelines for Meat Products Point Source Category, 40 CFR Part 432, Subpart G - Sausage and Luncheon Meats Processor Subcategory. Since the facility has been able to meet its limits from the previous permit, it is expected that the facility will be able to meet its limits with the allowance for the additional meat production. Therefore, additional allowances for the dressing mix, roux processing wastewater, and sanitary wastewater should not be necessary.

Calculations:

lbs/1000 lb				
	<u>Processed Meat</u>	x	<u>Process volume</u>	= <u>Final Limit (lbs/day)</u>
BOD - Avg:	0.28		x 18.5	5.18 lbs/day
- Max:	0.56		x 18.5	10.4 lbs/day
TSS - Avg:	0.34		x 18.5	6.29 lbs/day
- Max:	0.68		x 18.5	12.6 lbs/day
O&G - Avg:	0.10		x 18.5	1.85 lbs/day
- Max:	0.20		x 18.5	3.7 lbs/day

BAT Best Available Technology Economically Achievable
 BPJ Best Professional Judgement
 BPT Best Practicable Control Technology
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.